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September 9, 2024

**VIA CM/ECF**

The Honorable Eleanor G. Tennyson  
United States District Court  
for the District of Delaware  
J. Caleb Boggs Federal Building  
844 N. King Street  
Wilmington, DE 19801-3555

**Re: *United States of America v. Walmart Inc., et al.*,  
C.A. No. 20-1744-CFC-EGT**

Dear Judge Tennyson,

Pursuant to the Court's August 28, 2024 Oral Order, D.I. 141, I write to inform the Court that the parties met and conferred by Microsoft Teams on September 4, 2024 for approximately 45 minutes regarding the three discovery disputes that are the subject of Walmart's August 27, 2024 Motion for Teleconference, D.I. 140. The following attorneys participated in the meet-and-confer:

**Plaintiff's Counsel**

Elizabeth Vieyra  
Katherine Ho  
Kate Brunson  
Kim Stephens

**Defendants' Counsel**

Kelly Farnan  
Jason Varnado  
William Laxton, Jr.  
James Carlson  
Andrew Junker

The parties have met and conferred on a variety of issues eight times since the United States served its written responses on May 31, 2024, including on a weekly basis throughout July and August. Despite their best efforts, the parties remain at impasse with respect to the three disputes raised in D.I. 140.

Respectfully,

*/s/ Kelly E. Farnan*

Kelly E. Farnan (#4395)

cc: Counsel of Record (By ECF)

